

1 ROBERT W. FREEMAN, ESQ.  
Nevada Bar No. 003062  
2 Email: [Robert.Freeman@lewisbrisbois.com](mailto:Robert.Freeman@lewisbrisbois.com)  
DANIELLE C. MILLER, ESQ.  
3 Nevada Bar No. 009127  
Email: [Danielle.Miller@lewisbrisbois.com](mailto:Danielle.Miller@lewisbrisbois.com)  
4 LEWIS BRISBOIS BISGAARD & SMITH LLP  
6385 S. Rainbow Boulevard, Suite 600  
5 Las Vegas, Nevada 89118  
702.893.3383  
6 FAX: 702.893.3789  
*Attorneys for Defendant*  
7 *USAA General Indemnity Company*

8  
9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF NEVADA

11 EMILY ZERVAS,  
12  
13 Plaintiff,  
14  
15 vs.

16 USAA GENERAL INDEMNITY COMPANY,  
a foreign corporation doing business in  
Nevada, DOES I through X and ROE  
CORPORATIONS XI through XX,  
17 Defendants.

CASE NO. 2:18-cv-00051-JAD-GWF

STIPULATION AND ORDER TO EXTEND  
DEADLINE FOR USAA'S REPLY IN  
SUPPORT OF MOTION FOR SUMMARY  
JUDGMENT

ECF No. 30

18  
19 IT IS HEREBY STIPULATED AND AGREED, by and between Danielle C. Miller,  
20 Esq. of LEWIS BRISBOIS BISGAARD & SMITH LLP, counsel for Defendant USAA  
21 General Indemnity Company ("USAA"), and William W. McGaha, Esq. of SCHUETZE &  
22 McGAHA, P.C., counsel for Plaintiff Emily Zervas ("Plaintiff"), that:

23 The due date for USAA's Reply in Support of its Motion for Summary Judgment  
24 (ECF No. 14) be extended from May 14, 2018 to June 4, 2018.

25 This Request for an extension of time is not sought for any improper purpose or  
26 other purpose of delay. This request for extension is based upon the following:

27 Counsel for Defendants initiated this request because they have been hired by the  
28 Clark County School District to conduct an investigation into allegations made by a former

1 employee regarding accusations of rampant favoritism and discrimination. This  
2 investigation requires numerous interviews of prospective witnesses and the review of  
3 voluminous pertinent documents. Counsel for Defendants are also occupied with  
4 reviewing and disclosing extensive ESI discovery in a 600 Member Class Action Lawsuit,  
5 *Small et al v. University Medical Center of Southern Nevada*, U.S. District Court, 2:13-cv-  
6 00298-APG-PAL. This is USAA and Plaintiff's first request to extend this deadline, which  
7 is made in good faith and not for purposes of delay.

8 WHEREFORE, the parties respectfully request that this Court extend the time for  
9 USAA to file its Reply in Support of its Motion for Summary Judgment from May 14, 2018  
10 to June 4, 2018.

11 DATED this 3 day of May, 2018

12 SCHUETZE & McGAHA, P.C.

13  
14 By: 

15 WILLIAM W. McGAHA, ESQ.  
16 Nevada Bar No. 003234  
601 S. Rancho Drive, Suite C-20  
17 Las Vegas, Nevada 89106  
Telephone: (702) 369-3225  
18 *Attorneys for Plaintiff*

DATED this 3 day of May, 2018

LEWIS BRISBOIS BISGAARD & SMITH LLP

19 By: 

20 ROBERT W. FREEMAN, ESQ. #10171  
21 Nevada Bar No. 003062  
DANIELLE C. MILLER, ESQ.  
22 Nevada Bar No. 009127  
6385 S. Rainbow Boulevard, Suite 600  
23 Las Vegas, Nevada 89118  
Telephone: (702) 893-3383  
24 *Attorneys for Defendant*  
25 *USAA General Indemnity Company*

26 ORDER

27 IT IS SO ORDERED. The parties are cautioned, however, that counsel's workload  
28 will not constitute good cause for further extensions of this deadline.

  
U.S. District Judge Jennifer A. Dorsey

Dated: May 4, 2018